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June 25, 2013

Arizona Corporation Commission

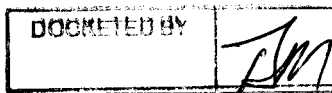
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JUN 25 2013

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HAND-DELIVERED

Steve Olea, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007



**Re: Johnson Utilities, L.L.C.: Compliance with Decision 65840
Notice of Violation from ADEQ dated June 17, 2013
ADEQ Case ID: 141428 (Johnson Ranch DWTP, Place ID 9127)
(Consolidated Docket Nos. WS-02987A-99-0583; WS-02987A-00-0618; W-02234A-00-0371; W-02859A-00-0774; and W-01395A-00-0784)**

Dear Mr. Olea:

On June 17, 2013, Johnson Utilities, L.L.C., ("Johnson Utilities" or the "Company") received a letter from the Arizona Department of Environmental Quality ("ADEQ") dated June 17, 2013, transmitting a Notice of Violation ("NOV") for the Johnson Ranch potable water system identified as Case ID #141428. A copy of the NOV was provided to you under cover letter dated June 21, 2013, and filed in the above-referenced dockets. Also on June 21, 2013, Johnson Utilities provided its written response to ADEQ regarding the NOV. In accordance with the requirements of Decision 65840, enclosed is a copy of the Company's June 21, 2013 responding to the "documenting compliance" requirements of the NOV.

Should you have any questions regarding the NOV, please do not hesitate to contact the Company or me.

Sincerely,

Jeffrey W. Crockett

JWC:jp
Enclosure
cc w/enclosure: Docket Control (14 copies)
Brian Bozzo, Compliance Manager
Greg Brown
Daniel Hodges

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JOHNSON UTILITIES, L.L.C.

5230 East Shea Boulevard, Suite 200 * Scottsdale, Arizona 85254

PH: (480) 998-3300; FAX: (480) 483-7908

June 21, 2013

Joseph P. Reyes
Water Quality Utility Field Service Unit
Arizona Department of Environmental Quality
1110 W Washington St., MC: 5415B-1
Phoenix, AZ 85007

Re: Notice of Violation, Case ID #: 141428

Dear Mr. Reyes:

Johnson Utilities, L.L.C. (JU) is responding to the Arizona Department of Environmental Quality's (ADEQ) Notice of Violation (NOV), Case ID #:141428, dated June 17, 2013. Section II, Documenting Compliance, contains two compliance items. One item is due by July 17, 2013, within 30 days. One is due by June 27, 2013, within 10 days. Our response to the compliance items are provided below.

1. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or documentation that demonstrates that water pressure within the Johnson Ranch distribution system is at least 20 pounds per square inch (psi) at all times.

Date Due: July 17, 2013.

Response: On June 14, 2013, after a news story alleged that some residents in Johnson Ranch were experiencing low water pressure, JU took pressure readings at several locations in the Solera subdivision (the highest location in the area) to determine whether a low pressure problem existed. JU took the readings at a representative range of locations throughout the subdivision. None of the readings showed low water pressure. All of the readings showed pressure above 20 psi as required in the ADEQ regulations. The results of the pressure readings were as follows:

No.	Date	Time	Address	psi
1	6/14/2013	8:00 AM	977 W. Desert Lilly Drive	40
2	6/14/2013	8:00 AM	1197 W. Rolls Rd	33
3	6/14/2013	8:00 AM	31853 N. Larkspur Drive	42
4	6/14/2013	8:00 AM	31986 N. Larkspur Drive	40
5	6/14/2013	8:00 AM	32201N. Echo Canyon Rd	48
6	6/14/2013	8:00 AM	31416 N. Gold Field Rd	35
7	6/14/2013	8:00 AM	1010 W. Mountain Peak Way	33

No.	Date	Time	Address	psi
8	6/14/2013	8:00 AM	1157 W. Desert Lily Drive	40

These locations are shown on Figure 1.

JU took the pressure readings on its own initiative on June 14, prior to receiving the June 17 NOV from ADEQ, but the JU pressure readings were taken after the ADEQ readings (which were taken June 7-12). As the readings taken by JU show, the water pressure within the Johnson Ranch distribution system is at least 20 psi.

A pressure recording device was set at the highest elevation in the Solera subdivision on June 20, 2013 at 31508 N. Gold Field Rd. A print out of the data is attached. This data documents that the distribution system is above 20 psi.

2. Within 10 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or describe the measures that have been or will be taken to resolve waterline pressure. The distribution system shall be designed to maintain and shall maintain a pressure of at least 20 psi at ground level at all points in the distribution system under all conditions.

Date Due: June 27, 2013.

Response: While the water pressure in the Johnson Ranch distribution system currently exceeds 20 psi as required by the ADEQ regulations, JU has several projects under construction to improve pressure in the operating system even more. They are as follows:

1. Installed 12" water line from Hardison well to the Main Yard storage tanks. This will increase the supply of water to the tanks. ECC submitted 6/19/13 to ADEQ
2. Installed new well (Attaway well). ECC submitted 6/21/13 to ADEQ
3. Installed new 12" water line connecting the Attaway well to the distribution system. ECC submitted 6/13/13 to ADEQ
4. Installation of a new 12" transmission water line connecting the Skyline and San Tan wells to the Morning Sun Water Plant (EPDS 010). These wells had been removed from the system due to high nitrate levels. Pursuant to a blending plan approved by ADEQ, the water from these wells will be blended with water from the Morning Sun wells that have nitrate concentrations around 1 ppm to ensure that the water meets applicable requirements..
 - a. Approval to Construct issued by ADEQ on 5/3/13
 - b. Easements from property owners were recorded on 6/13/13
 - c. Presently awaiting ROW permit from Pinal County (anticipate approval 6/24/13)

Joseph P. Reyes
June 21, 2013
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5. Complete construction of the new 1 million gallon Bella Vista water plant and well.

a. Submittal of ECC is expected within 30 to 60 days.

If you have any questions or comments, please contact me at (480) 998-3300.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. H. Brown', with a long horizontal flourish extending to the right.

Gregory H. Brown, P.E.
Director of Engineering

Enclosures: Figure 1
Pressure Recording Data

Pressure Recording Data

6/20/13 -6/21/13

Set by: Ken Marks, WLB

Rod Spencer, Johnson Utilities

6/20/2013 12:10	42	4320
6/20/2013 12:15	40.6	4321
6/20/2013 12:20	42.4	4322
6/20/2013 12:25	43.5	4323
6/20/2013 12:30	40	4324
6/20/2013 12:35	38.6	4325
6/20/2013 12:40	40.9	4326
6/20/2013 12:45	43.9	4327
6/20/2013 12:50	44.9	4328
6/20/2013 12:55	44.6	4329
6/20/2013 13:00	45.3	4330
6/20/2013 13:05	40.8	4331
6/20/2013 13:10	41.6	4332
6/20/2013 13:15	41.3	4333
6/20/2013 13:20	44.2	4334
6/20/2013 13:25	45.4	4335
6/20/2013 13:30	43	4336
6/20/2013 13:35	41.1	4337
6/20/2013 13:40	40.8	4338
6/20/2013 13:45	41.5	4339
6/20/2013 13:50	43.9	4340
6/20/2013 13:55	44.9	4341
6/20/2013 14:00	47.5	4342
6/20/2013 14:05	46.4	4343
6/20/2013 14:10	47.1	4344
6/20/2013 14:15	45.5	4345
6/20/2013 14:20	45.4	4346
6/20/2013 14:25	46	4347
6/20/2013 14:30	47	4348
6/20/2013 14:35	47.3	4349
6/20/2013 14:40	41.8	4350
6/20/2013 14:45	43.1	4351
6/20/2013 14:50	42	4352
6/20/2013 14:55	40	4353
6/20/2013 15:00	43.1	4354
6/20/2013 15:05	42.4	4355
6/20/2013 15:10	45.4	4356
6/20/2013 15:15	46.4	4357
6/20/2013 15:20	47.6	4358
6/20/2013 15:25	43.6	4359
6/20/2013 15:30	41.9	4360
6/20/2013 15:35	44.2	4361
6/20/2013 15:40	47	4362
6/20/2013 15:45	45.1	4363
6/20/2013 15:50	46.5	4364
6/20/2013 15:55	47.2	4365
6/20/2013 16:00	46.7	4366

6/20/2013 16:05	42.4	4367
6/20/2013 16:10	40.6	4368
6/20/2013 16:15	42.1	4369
6/20/2013 16:20	45.6	4370
6/20/2013 16:25	45.8	4371
6/20/2013 16:30	46.5	4372
6/20/2013 16:35	45.6	4373
6/20/2013 16:40	41.8	4374
6/20/2013 16:45	41.9	4375
6/20/2013 16:50	42.6	4376
6/20/2013 16:55	46.5	4377
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6/20/2013 17:45	48	4387
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6/20/2013 18:55	42.4	4401
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6/20/2013 19:10	41.4	4404
6/20/2013 19:15	40.2	4405
6/20/2013 19:20	39.2	4406
6/20/2013 19:25	42.5	4407
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6/20/2013 20:35	38.4	4421
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6/20/2013 21:00	39.6	4426
6/20/2013 21:05	37.8	4427
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6/20/2013 21:50	39.7	4436
6/20/2013 21:55	39	4437
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6/20/2013 22:10	38.5	4440
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6/20/2013 23:10	37.6	4452
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6/20/2013 23:25	42.5	4455
6/20/2013 23:30	43.2	4456
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6/20/2013 23:40	41.2	4458
6/20/2013 23:45	38.7	4459
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6/21/2013 11:05	42.9	4595
6/21/2013 11:10	41.8	4596
6/21/2013 11:15	37.7	4597
6/21/2013 11:20	39.6	4598
6/21/2013 11:25	43.6	4599
6/21/2013 11:30	44.6	4600
6/21/2013 11:35	39.9	4601